



COMMONWEALTH of VIRGINIA

DEPARTMENT OF WASTE MANAGEMENT
11th Floor, Monroe Building
101 N. 14th Street
Richmond, VA 23219
(804) 225-2667

APR 12 1990

Certified-Return
Receipt Requested

J. P. Aldred, Environmental Engineer
Intermet Corporation
P. O. Box 6200
Lynchburg, Virginia 24505

Re: VAD000820514-Compliance Inspection, Lower Basin Plant

Dear Mr. Aldred:

During a February 6, 1990 inspection, it was noted that this facility was not in compliance with the Virginia Hazardous Waste Management Regulations (VHWMR). Such instances are indicated by check marks on the enclosed inspection checklists and are listed below:

1. The corresponding treatment standards and all applicable prohibitions set forth in VHWMR § 15.3.C as required by the VHWMR § 15.1.G.1.b.(1)(b). were not submitted to the treatment, storage or land disposal facility with each shipment of restricted waste. This issue is being referred to EPA Region III for resolution.

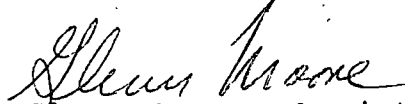
Please take the appropriate corrective action to bring your facility into compliance with the VHWMR by May 15, 1990 and document specific corrective actions taken via return correspondence.

J. P. Aldred

Page 2

If there are any questions, please feel free to call me at (804) 225-3754.

Very truly yours,

A handwritten signature in cursive script that reads "Glenn Moore".

Glenn Moore, Chemist
Division of Technical Services

Enclosures

CC: Melvin Wrenn
Intermet Corporation, LFC-Lower Basin.
P. O. Box 6200
Lynchburg, Virginia 24505

MARCH 1990

SURVEY SHEET
FOR INSPECTION OF HAZARDOUS WASTE FACILITIES

Name of Facility: INTERMET CORP. LFC-LOWER BASIN
Address: P.O. Box 6200 CONCORD ROAD
LYNCHBURG, VA. 24505
EPA ID Number: VAD 000 820 514
Facility Representative: MELVIN WRENN
Title: ENGINEER
Telephone Number: (804) 528-8395
Inspector's Name: GLEN A MOORE
Title: CHEMIST
Date of Inspection: 2/6/90

1. What is the business activity of the firm? (i.e., furniture mfg., metal plating, recycling, etc.) FOUNDRY

2. Give a brief description of the waste stream(s) and hazardous waste code(s) generated by the firm.

D006/D008 CUPOLA BAGHOUSE DUST
D001 SAFETY KLENN PARTS CLEANING
F002
F003 WASTE GENERATED BY PROCESS CHANGES
D001
F005

3. List the amounts of hazardous waste generated on a monthly basis (use the highest monthly total) and the greatest amount accumulated at the site of each type of waste generated.

Waste Code	Amount Generated	Amount Accumulated
<u>D006/D008</u>	<u>110 TONS/MO</u>	<u>4.5 TONS</u>
<u>D001</u>	<u>32 gal/s/mo</u>	<u>SAFETY KLENN CONTRACT</u>
<u>F002</u>	<u>110 gal/s/mo</u>	
<u>F003</u>	<u>55 gal/s/mo</u>	<u>15-55 gal/DRUMS</u>
<u>D001</u>	<u>55 gal/s/mo</u>	
<u>F002</u> {waste oil contaminated with water/solvents	<u>200 gal/s/mo</u>	<u>NONE * See Comments</u>

4. Does the facility ever generate greater than:
1 kg. of acutely toxic waste (P listed waste or YES ☒ NO
F020-F023 and F026-F027)?

100 kg of clean-up from a spill of P listed waste YES ☒ NO
or F020-F023 and F026-F027 waste?

If yes, then the facility is a generator.

5. How is the waste presently being handled? Where is it sent?
TO OFF-SITE TSD VIA H.W. MANIFEST
See LIST AFTER QUESTION #14

6. Does the facility generate any hazardous waste YES ☒ NO
that is excluded from regulation? If yes, list the
waste and the basis for exclusion.

7. Does the facility generate any hazardous waste YES ☒ NO
that is burned for energy recovery (hazardous waste
fuel)? If yes, list the waste, where it is sent, and
complete the Recyclable Materials Checklist.

8. Does the facility generate any used oil that YES ☒ NO
is burned for energy recovery (used oil fuel),
including used oil that is also a characteristic
hazardous waste, or used oil that is mixed with
hazardous waste generated by a conditionally exempt
Small Quantity Generator? If yes, list the waste, where
it is sent, and complete the Recyclable Materials Checklist.

EASTERN WASTE OIL Co.
USED oil picked up by 4020 CAROLYN DRIVE
ROANOKE, VA. 24019
AND RECLAIMED.

9. Does the facility generate any hazardous waste that is reclaimed to recover economically feasible amounts of gold, silver, platinum, palladium, iridium, osmium, rhodium, ruthenium, or any combination of these? YES ☒ NO
If yes, list the waste, where it is sent, and complete the
R e c y c l a b l e M a t e r i a l s C h e c k l i s t .

10. Does the facility generate, transport or collect spent lead-acid batteries? If yes, complete the Recyclable Materials Checklist. YES ☒ NO

11. Based on the above, the facility is a:

- a. conditionally exempt small quantity generator
- b. small quantity generator
- ☒ c. generator
- d. permitted or interim status TSD
- e. unpermitted TSD (explain in comments section)

[Circle One]

12. Check accumulation times and quantities for the three types of generators. If the times or quantities are exceeded, then the facility is moved up to the next category. Complete the appropriate checklist(s).

A conditionally exempt small quantity generator can accumulate indefinitely, but if the amount accumulated ever exceeds 1000 kgs. then he becomes a small quantity generator. At the time the 1000 kg. limit is passed, the accumulation times for small quantity generators begins.

Small quantity generators can accumulate up to 180 days or 270 days if the disposal site is over 200 miles away. However, if at any time over 6000 kgs. of waste is accumulated, then the small quantity generator becomes a generator.

13. List each container and tank accumulation area. Specify the number and capacity of each tank. [Note: Include any satellite accumulation areas. Verify that only 55 gallons of any particular hazardous waste code (or one quart of acutely toxic waste) is at that site.]

Location	Number of Containers	Number of Tanks	Capacity
Baghouse #1	1 - (D006/D008)	-	2-3 TONS
Baghouse #2	1 - (D006/D008)	-	2-3 TONS
M. Shop	1 (D001)		16991s
F.h. Shop	1 (D001)		16991s
Accumulation AREA	15- 55991 DRUMS (F-listed + D001)		30-55991 DRUMS

14. Comments

TWO BATCHES OF USED OIL THAT BECAME CONTAMINATED WITH WATER, THEREFORE EASTERN WASTE OIL WOULD NOT TAKE IT.

IT WAS DISPOSED OF AS HAZARDOUS WASTE (F002). MANIFEST AND CERTIFICATES OF DISPOSAL ATTACHED

F002 (waste oil and solvent)
SEABOARD CHEMICAL CORP
JAMESTOWN, NC. 27282
NCD 071574164

TRANSPORTED BY
FREEHOLD CARTAGE
NSD 054126164

F002
D001 } ENVIRONMENTAL ENTERPRISES
F003 } CINCINNATI, OH 45232
OHD 083377610

TRANSPORTED BY
ENVIRONMENTAL OPTIC
VAD 112973185

D006/D008 - Baghouse Dust

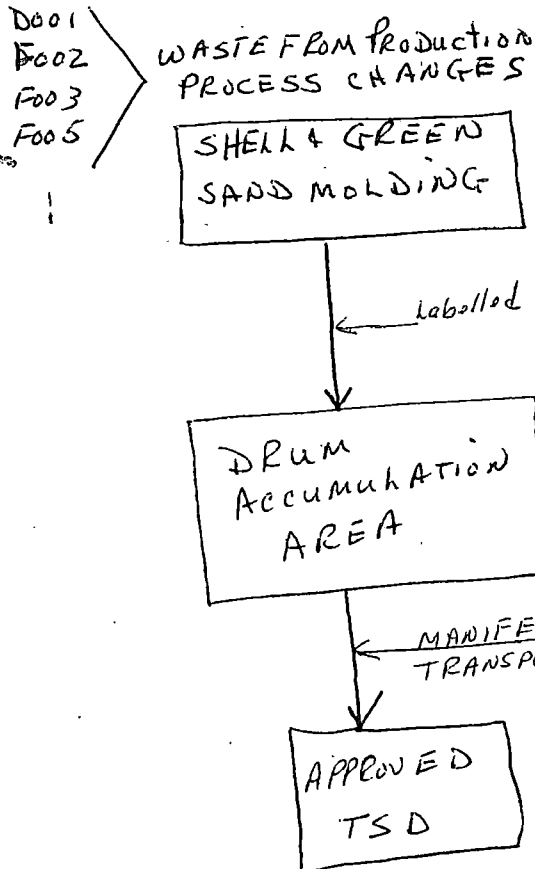
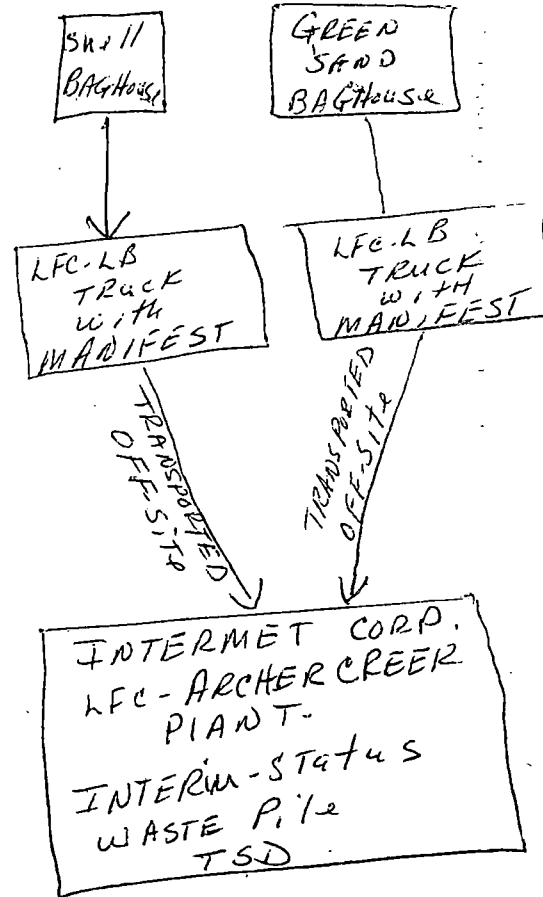
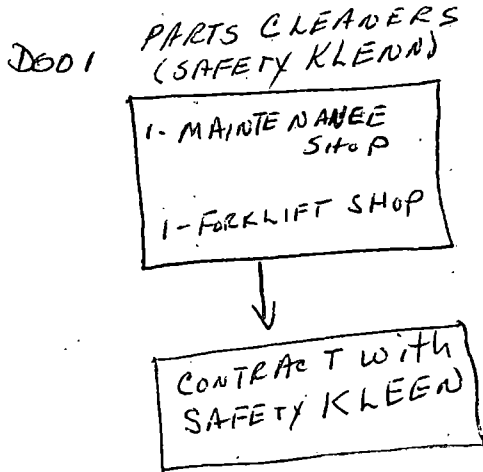
INTERMET CORP.
LFC - ARCHER CREEK PLANT
LYNCHBURG, VA 24505
VAD 000820506

TRANSPORTED BY
INTERMET CORP.
LFC - LOWER BASIN
TRUCK
VAD 000820514

15. Waste Management Flow Diagram

(On this page sketch a brief, but detailed, flow diagram that includes where the waste is generated, the steps through a treatment system (if any), the steps through storage including satellite accumulation areas. Do this for each waste stream including excluded hazardous waste. Include any wastewater treatment facilities at the company, and verify the type of units included in the system, and any hazardous waste streams going to WWT.)

D006/D008



LYNCHBURG FOUNDRY COMPANY

To: GLEN MOORE

From: Melvin Wrenn

Date: 4/4/90

Subject: MANIFESTS WASTE OIL

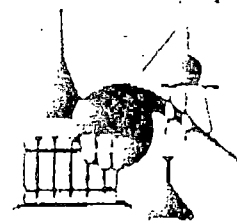
ATTACHED ARE COPIES OF MANIFESTS NUMBER 32189 AND 41289 FOR WASTE OIL. ALSO, I AM ENCLOSING THE CERTIFICATE OF DISPOSAL.

CC: P. ALDRED



UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No VAD0000820514	Manifest Document No. 41289	2. Page of 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address Lynchburg Foundry Co. 528-8395 Concord Rd. Lower Basin Lynchburg, Va. 24505				A. State Manifest Document Number		
4. Generator's Phone (804) _____				B. State Generator's ID		
5. Transporter 1 Company Name Fitzthum Cartage, Inc.		6. US EPA ID Number NJD054126164		C. State Transporter's ID NJDEP 2105		
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone 201 462-1001		
9. Designated Facility Name and Site Address Seaboard Chemical, Corp. 5899 Riverdale Dr. Jamestown, N.C. 27282		10. US EPA ID Number NCD0711574164		E. State Transporter's ID		
				F. Transporter's Phone		
				G. State Facility's ID		
				H. Facility's Phone 919 886 4804		
11. US DOT Description (including Proper Shipping Name, Hazard Class and ID Number)		12. Container No.	13. Total Quantity	14. Unit (Metric)	15. Waste Code	
a. <input checked="" type="checkbox"/> Hazardous Waste Liquid, N.O.S. ORM-A Na9169		1	1	G	F002	
b.						
c.						
d.						
16. Additional Descriptions for Materials Listed Above T/L 2				17. Handling Codes for Wastes Listed Above		
18. Space Handling Plans, Comments, or Additional Information						
19. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, hazard class, label, packaging, marking, and labeling, and are in all respects in proper condition for transport by highway. I am a large quantity generator or facility and I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be appropriate, and I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the treatment, storage, or disposal method that is available to me and that I can afford.						
Signature		Signature		Month Day Year		
Signature		Signature		Month Day Year		
Signature		Signature		Month Day Year		
19. Additional Information (Optional)						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Signature		Signature		Month Day Year		

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. VAD000820514		Manifest Document No. 32189		2. Page 1 of 1		Information in the shaded areas is not required by Federal law					
		3. Generator's Name and Mailing Address Lynchburg Foundry Co. Concord Rd. Lower Basin Lynchburg, Va. 24505						A. State Manifest Document Number					
4. Generator's Phone (804) 528-8395						B. State Generator's ID							
5. Transporter 1 Company Name Freehold Cartage						6. US EPA ID Number VTD054126164		C. State Transporter's ID NDEPS 22265					
7. Transporter 2 Company Name						8. US EPA ID Number		D. Transporter's Phone 201 462-1001					
9. Designated Facility Name and Site Address Seaboard Chemical Corp. 5899 Riverdale Dr. Jamestown, N.C. 27282						10. US EPA ID Number NCD071574164		E. State Transporter's ID					
								F. Transporter's Phone					
								G. State Facility's ID					
								H. Facility's Phone 919 886-4804					
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers		13. Total		14. Unit		15. Waste No.	
						No. Type		Quantity		Wt/Vol			
a. Hazardous Waste Liquid, N.O.S. ORM-A NA9189						1 1T		3337		G		F002	
b.													
c.													
d.													
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above							
15. Special Handling Instructions and Additional Information DECAL # 21692													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.													
Printed/Typed Name [Signature]						Signature [Signature]				Month Day Year 3 27 81			
17. Transporter 1 Acknowledgement of Receipt of Materials													
Printed/Typed Name GEORGE W. Cyr						Signature George W. Cyr				Month Day Year 3 29 81			
18. Transporter 2 Acknowledgement of Receipt of Materials													
Printed/Typed Name						Signature				Month Day Year			
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.													
Printed/Typed Name [Signature]						Signature [Signature]				Month Day Year 3 29 81			



SEABOARD CHEMICAL CORPORATION

CHEMICAL CONVERSIONS AND RECLAIMING

5599 Riverdale Drive
Jamestown, North Carolina 27282
Telephone (919) 886-6304

CERTIFICATE OF DISPOSAL

This hereby certifies that waste as defined on your Hazardous Waste
Manifest No. 32189, was received by Seaboard
Chemical Corporation EPA I.D. No. NCD 071574164. Waste material
received on: DAY 28 MONTH 3 YEAR 89.

This waste was disposed of in accordance with Federal and State Regulations
(No. 40 CFR 20).

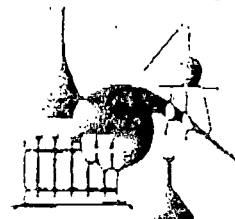
Disposal Method: TDS - GSX - Incineration
Date of Disposal: 5-31-89

JOHN O. EVANS
Printed/Typed Name

Sales Manager
Title

[Signature]
Signature

Date: 6-23-89



SEABOARD CHEMICAL CORPORATION

CHEMICAL CONVERSIONS AND RECLADDING

5889 Riverdale Drive
Jamestown, North Carolina 27312
Telephone (919) 888-4804

CERTIFICATE OF DISPOSAL
Lynchburg Foundry Co,
Concord Rd, Lower Basin
Lynchburg, VA 24505

This hereby certifies that waste as defined on your Hazardous Waste
Manifest No. 41289, was received by Seaboard
Chemical Corporation EPA I.D. No. NCD 071574164. Waste material
received on: DAY 12 MONTH 4 YEAR 1989.

This waste was disposed of in accordance with Federal and State Regulations
(No. 40 CFR 20).

Disposal Method: Fuel Blended
Date of Disposal: 5-4-89

Hal Browne
Printed/Typed Name

Hal Browne
Signature

Sales Service Manager
Title

Date: 5-15-89

MARCH 1990

CHECKLIST FOR HAZARDOUS WASTE
INSPECTION OF GENERATORS

Name of Facility: INTERMET CORP. LFC- LOWER BASIN

Address: P.O. Box 6200 CONCORD ROAD

LYNCHBURG, VA. 24505

EPA ID Number: VAD 00 0820514

Facility Representative: MELVIN WRENN

Title: ENGINEER

Telephone Number (804) 528-8395

Inspector's Name: GLENN MOORE

Title: CHEMIST

Date of Inspection: 2/6/90

Va. Hazardous Generator Checklist
Waste Reg.

6.3.

1. Is a manifest system currently being used for all hazardous waste shipped off site?

☒ YES ☐ NO

6.2.C.

2. Has the generator determined that the transporter(s) and facility have an EPA ID number? [Note: Shipments to POTWs must be manifested and the POTW must meet all permit-by-rule requirements of VHWMR Section 11.8.B.]

☒ YES ☐ NO

5.5.A.7

3. Has the generator determined that the transporter has a valid EPA Identification number and a valid Virginia Transporter Permit?

☒ YES ☐ NO

6.3

5.3.B.1.

4. Is the following information on the manifest:

- a. The generator's name, mailing address, EPA ID Number, and telephone number? ☒ YES ☐ NO
- 5.3.B.2. b. A unique five digit number assigned to this manifest by the generator? ☒ YES ☐ NO
- 5.3.B.3. c. The total number of pages of the manifest? ☒ YES ☐ NO
- 5.3.B.4. d. The company name and EPA ID number of each transporter used? ☒ YES ☐ NO
- 5.3.B.5. e. The company name, site address, and EPA ID number of the facility designated to receive the waste? ☒ YES ☐ NO
- 5.3.B.6. f. The U. S. DOT description of each waste to include its proper shipping name, hazard class, and I.D. number (UN/NA) as identified in the Virginia Regulations Governing the Transportation of Hazardous Material? ☒ YES ☐ NO
- 5.3.B.7. g. The quantities of waste being shipped? ☒ YES ☐ NO
- 5.3.C. h. The following certification: "I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by (mode of transportation) according to applicable international and national governmental regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to a degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and environment."

6.5.C.2.

5. Have manifests been received from the TSD facility for any waste which was shipped over 45 days ago? ☒ YES ☐ NO

If no, has the generator filed an exception report with the Executive Director which included: YES ☐ NO ☒ NA

6.5.C.2.a.

a. A legible copy of the manifest for which the generator does not have confirmation of the delivery; and YES ☐ NO ☒ NA

6.5.C.2.b.

b. A cover letter explaining the efforts taken to locate the shipment? YES ☐ NO ☒ NA

6.4.E.1.

6. Is hazardous waste being accumulated on-site for less than 90 days? If yes, ☒ YES ☐ NO

6.4.E.1.a.

a. Is the waste stored in containers? In tanks? ☒ YES ☐ NO ☒ YES ☐ NO
(If answer to either question is yes, fill out appropriate checklists. If both answers are no, interim status or a TSD permit is required - fill out facility checklist to determine compliance status).

6.4.E.1.b.

b. Is the date that accumulation begins clearly marked and visible for inspection on each container? ☒ YES ☐ NO

6.4.E.1.c.

c. Is each container and tank clearly marked with the words "Hazardous Waste"? ☒ YES ☐ NO

6.4.E.1.e.

d. Has the generator notified the Executive Director by March 1, 1988, of the exact location of the existing accumulation areas, and at least 15 days prior to use for subsequently established accumulation areas? ☒ YES ☐ NO

6.4.E.2.

7. Does the generator accumulate (store) hazardous waste on-site for greater than 90 days? If yes, interim status or a TSD permit is required - fill out facility checklist to determine compliance status. YES ☐ NO ☒

6.4.E.1.d.

8. Does the generator record inspections ☒ YES ☐ NO

- 9.1.F.4. in an inspection log?
- 6.4.E.1.d. 9. Have facility personnel successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures? ☒ YES NO
- 9.1.G.1.
- 9.1.G.2. 10. Have new employees to the facility successfully completed training mentioned above within 6 months of their employment or assignment to the facility? ☒ YES NO
- 9.1.G.3. 11. Do personnel participate in an annual review of the initial training? ☒ YES NO
12. Does the facility maintain a record of the following:
- 9.1.G.4.a. a. job titles for each position at the facility related to hazardous waste management; and ☒ YES NO
- 9.1.G.4.a. b. the name of the employee filling each job; and ☒ YES NO
- 9.1.G.4.b. c. a written job description for each position in (a); and ☒ YES NO
- 9.1.G.4.c. d. a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed in (a); and ☒ YES NO
- 9.1.G.4.d. e. Records that document that the training or job experience required above has been given to, and completed by facility personnel? ☒ YES NO
- 9.2.B. 13. At the facility, is the following equipment installed:
- 9.2.D.

9.2.B.1.

a. An internal communications or alarm system capable of providing immediate emergency instructions to facility personnel if the hazardous waste generation or accumulation areas are threatened by hazardous waste release, fire or explosion?

☒ YES NO

9.2.B.2.

b. A device (at the scene of hazardous waste generator operations) capable of summoning emergency assistance from Police, Fire Departments, etc.?

☒ YES NO

9.2.B.3.

c. Portable fire extinguishers, fire control, and decontamination equipment?; and

☒ YES NO

9.2.B.4.

d. Water at adequate volume and pressure to supply expected fire demands, foam producing equipment, automatic sprinklers or water spray system?

☒ YES NO

9.2.C.

14. Is a record of tests and inspections of items 13 a-d maintained at the facility?

☒ YES NO

9.2.E.

15. Does the facility have adequate aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment during emergencies?

☒ YES NO

6.4.E.1.d.
9.3.

16. Does the facility have an established contingency plan to deal with any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to the air, soil, ground water or surface water?

☒ YES NO

9.3.B.

17. Does the contingency plan contain the following elements:

9.3.B.(1,2).

a. A detailed description of emergency procedures facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous waste to air, soil, and water?

☒ YES ☐ NO

9.3.B.3.

b. A description of arrangements agreed to by local police departments, fire departments, hospitals, contractors and Commonwealth and local emergency response teams to coordinate emergency services, as required?

☒ YES ☐ NO

9.3.B.4.

c. A listing of names, addresses, and office and home phone numbers of all persons qualified to act as emergency coordinator? List primary Coordinator.

☒ YES ☐ NO

Name MELVIN WRENN

Title ENGINEER

Telephone (804) 528-8395

9.3.B.5.

d. A list of appropriate emergency equipment necessary to cope with emergencies at the generator facility?

☒ YES ☐ NO

9.3.B.6.

e. Does this list specify the location and physical description of each item on the list and a brief outline of its capabilities?

☒ YES ☐ NO

9.3.B.6.

f. An evacuation plan for the generator facility where there is a possibility that evacuation could be necessary?

☒ YES ☐ NO

9.3.C.

g. Have copies of the contingency plan been sent to all local police departments, fire departments, hospitals and Commonwealth and local emergency response teams?
List:

☒ YES ☐ NO

LYNCHBURG FIRE & POLICE DEPTS.

LYNCHBURG GENERAL HOSPITAL

9.3.C.

h. Is there documentation to indicate the personnel listed above received the contingency plan?

YES NO

9.3.F.(9,10).

i. Has the contingency plan ever been implemented?

YES NO

If yes, was a written report filed with the Executive Director and were the Executive Director and other required authorities properly notified before operations resumed?

YES NO

NA

6.4.E.3.a.

18. Does the generator have satellite accumulation areas? If yes,

YES NO

a. Is the area located at or near the point of hazardous waste generation where the wastes initially accumulate?

YES NO

6.4.E.3.a.(1)
9.8.B.

b. Are the containers in good condition?

YES NO

6.4.E.3.a.(1)
9.8.C.

c. Are the containers compatible with the waste?

YES NO

6.4.E.3.a.(1)
9.8.D.1.

d. Are the containers kept closed except as necessary to add or remove waste?

YES NO

6.4.E.3.a.(2)

e. Are the containers marked with the words "Hazardous Waste" or other words that identify the contents of the container?

YES NO

6.5.E.3.b.

f. Are amounts in excess of those allowed being accumulated in the satellite accumulation area? If yes,

YES NO

(1) Has the generator marked the **excess amount** with the date the excess amount began accumulating?

YES NO

NA

(2) Has the generator either removed the excess amount within three days of the date of excess accumulations or has he complied with all other provisions for accumulation areas listed in question 8 on this checklist? Namely, has he notified the

YES NO

NA

Executive Director about the location of the accumulation area?

If no, what has the generator chosen to do? _____

6.5.A.

19. Does the generator retain copies of all manifests, annual reports, and test results for at least three years?

☒ YES ☐ NO

6.5.B.

20. Has the facility submitted an annual report for the preceding calendar year?

☒ YES ☐ NO

21. Comments: 1988 ANNUAL REPORT Submitted.

1989 ANNUAL REPORT IN PROGRESS,

NOT Due UNTIL MARCH 1, 1990.

MARCH 1990

INSPECTION CHECKLIST FOR
THE USE AND MANAGEMENT OF CONTAINERS

Name of Facility: INTER MET CORP. LFC LOWER BASIN
Address: P. O. Box 6200 CONCORD ROAD
LYNCHBURG, VA. 24505
EPA ID Number: VAD 000820514
Facility Inspection Representative: MELVIN WREN
Title: ENGINEER
Telephone Number: (804) 528-8395
Inspector's Name: GLENN MOORE
Title: CHEMIST
Date of Inspection: 2/6/90

Va. Hazardous
Waste Reg.

9.8.B.

1. Are all containers holding hazardous waste in good condition, i.e., not showing signs of leakage or corrosion or any other deterioration/deformation?

☒ YES NO

If no, list the storage/accumulation areas where there are problems and the type of problem:

Location

Problem

9.8.C.

2. Are the containers lined or made of materials compatible with hazardous waste placed into them so that the container will not react with, or otherwise be incompatible with, the hazardous wastes stored?

☒ YES NO

6.4.E.b

3. Is the date upon which each period of accumulation begins clearly marked and visible for inspection on each container?

☒ YES ☐ NO

6.4.E.c.

4. Is the container labeled or marked clearly with the words "Hazardous Waste"?

☒ YES ☐ NO

9.8.D.1.

5. Are all containers holding hazardous waste kept closed during storage except as necessary to add or remove waste?

☒ YES ☐ NO

If no, list the locations where open containers are found. _____

9.8.E.

6. Are areas where hazardous waste containers are stored inspected by the owner/operator at least weekly?

☒ YES ☐ NO

9.1.F.2.a.

9.1.F.4.

6.4.E.1.d.

7. For large quantity generators and TSD facilities only:

Is an inspection log maintained?

☒ YES ☐ NO

9.8.F.

8. Are containers holding ignitable or reactive waste located at least 50 ft. from the facility's property line?

☒ YES ☐ NO

9.8.G.1.

9. Are incompatible wastes placed in separate containers?

☒ YES ☐ NO

9.8.G.3.

10. Are storage containers holding hazardous wastes which are incompatible with any materials or other hazardous wastes stored nearby separated from the other materials or protected from them by means of dikes, berms, walls, or other devices?

☒ YES ☐ NO

6.4.E.3.a.

11. For satellite accumulation areas:

a. Are there more than 55 gallons of any one type of waste present in the area?

YES (NO)

If yes,

6.4.E.3.b

b. Has the amount in excess of 55 gallons been in the satellite accumulation area longer than 3 days?

YES NO

NA

If yes,

6.4.E.3.b.

6.4.E.1.b.

c. Has the company notified the Department about the location of the accumulation area?

YES NO

NA

10. Comments:

15-55 gal. DRUMS ARE IN
Accumulation AREA.

OCTOBER 1989

CHECKLIST FOR HAZARDOUS WASTE INSPECTION OF
LAND-RESTRICTED WASTE MANAGEMENT

Name of Facility: INTERMET CORP. LFC-LOWER BASIN
Address: P.O. Box 6200 CONCORD ROAD
LYNCHBURG, VA. 24505
EPA ID Number: VAD000820514
Facility Representative: MELVIN WRENN
Title: ENGINEER
Telephone Number: (804) 528-8395
Inspector's Name: GLENN MOORE
Title: CHEMIST
Date of Inspection: 2/6/90

1. Does the facility generate, transport, or treat, store or dispose any land-restricted wastes? (See Attachment)

YES

NO

If yes, please list:

F002, F003, F005

15.1.A.3.

2. Is land disposal of wastes listed in 1^a above occurring? YES NO

NO

If yes, then:

15.1.A.3.a.

a. Has the facility been granted an extension to the effective date for land restrictions applicable to its restricted waste? (See effective dates listed in Attachment)

YES

NO

NA

15.1.A.3.b.

b. Has the facility been granted an exemption from prohibition pursuant to a petition for those land-restricted wastes and units covered by the petition?

YES

NO

NA

15.1.A.3.c.	c. Is the waste generated by small quantity generators of less than 220 pounds (100 kg) of hazardous waste, or 1 kg of acutely hazardous waste, per month?	YES NO NA
15.1.E.	d. Has the owner/operator submitted an application for a case-by-case extension to the effective date of any applicable restriction?	YES NO NA
15.1.F.	e. Has the owner/operator been granted a petition seeking an exemption from a prohibition for the disposal of hazardous waste in a particular unit or units?	YES NO NA
15.1.D.1.	<p>3. Is the facility treating land-restricted wastes in a surface impoundment or series of surface impoundments? (If <u>no</u>, go to number 6) [If <u>yes</u>, complete surface impoundment checklist] [Note: Evaporation of hazardous constituents as the principal means of treatment is not considered to be an acceptable form of treatment for land restricted wastes.]</p> <p>If <u>yes</u>, does the facility meet the following requirements:</p>	YES NO (NO)
15.1.D.1.b 15.1.G. 15.3.C. 15.4. 15.3.	a. Are the residues of the treatment analyzed as specified in VHWMR Sections 15.1.G. or 15.3.C. to determine if they meet the applicable treatment standards or VHWMR Section 15.4, or where no applicable treatment standard exists, the applicable prohibition levels specified in VHWMR Section 15.3?	YES NO NA
15.1.D.1.c. 9.10.B.1. 10.10.B.3.	b. Has the owner or operator installed two or more liners and a leachate collection system consisting of an upper and lower liner designed, constructed and operated to prevent the migration of any constituents through the liners?	YES NO NA
15.1.D.1.c. 10.5.	c. Is the facility in compliance with the applicable groundwater monitoring requirements of VHWMR Section 10.5.?	YES NO NA

- 15.1.D.1.d. 4. Has the owner or operator submitted a written certification to the Executive Director that items 4 a-c have been met which states, YES NO
NA
- "I certify under penalty of law that the requirements of 15.1.D.1.c. have been met for all surface impoundments being used to treat restricted wastes. I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."?
- 15.1.D.1.d. 5. Has the owner/operator submitted a copy of the waste analysis plan for his restricted wastes? YES NO
NA
- 15.1.G.1. 6. Has the owner/operator determined if his waste is a land restricted waste? YES NO
YES
- 15.1.G.1a. 7. For restricted wastes which the generator is managing for which he has not met the applicable treatment standards, has the generator accompanied each shipment of waste with a notification to the treatment facility of the appropriate treatment standards and any applicable prohibitions? YES NO
YES
- Did the notification include the following information:
- 15.1.G.1.b.1a - EPA Hazardous Waste Number; YES NO
YES
- 15.1.G.1.b.1b - The corresponding treatment standards and all applicable prohibitions set forth in VHWMR Section 15.3.C; YES NO
YES
- 15.1.G.1.b.1c - The manifest number associated with the shipment of waste; YES NO
YES
- 15.1.G.1.b.1d - Waste analysis data, where available? YES NO
YES
- 15.1.G.1.b. 8. For restricted wastes which the generator has determined can be land disposed without further treatment, has the generator accompanied each shipment of waste with a notification and certification to the land disposal facility that the waste meets the applicable treatment standards and the applicable prohibitions of VHWMR Section 15.3.C? YES NO
NA
- a. Did the notification contain the following information:

15.1.G.1.b.1a	- EPA Hazardous Waste Number;	YES	NO	NA
15.1.G.1.b.1b	- The corresponding treatment standards and all applicable prohibitions;	YES	NO	NA
15.1.G.1.b.1c	- The manifest number associated with the shipment of waste; and	YES	NO	NA
15.1.G.1.b.1d	- Waste analysis data, where available?	YES	NO	NA
15.1.G.1.b.2.	b. Was the certification signed by an authorized representative, and did it state the following: "I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in VHWMR Section 15.4. and all applicable prohibitions set forth in VHWMR Section 15.3.C. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."	YES	NO	NA
15.1.G.1.c.	9. For restricted wastes which have received a case-by-case exemption, been granted an exemption through petition, or those wastes subject to a national variance, has the generator forwarded a notice with the waste to the land disposal facility stating that the waste is exempt from the land disposal restrictions?	YES	NO	NA
15.1.G.2.	10. <u>For Treatment Facilities ONLY:</u> Has the owner or operator of the treatment facility tested the treatment residues or extract to assure that they shall meet the applicable treatment standards?	YES	NO	NA
15.1.G.2.	a. Has this testing been done at the frequency stated in the waste analysis plan?	YES	NO	NA
15.1.G.2.a.	b. For treatment residuals which do not meet the applicable treatment standards, has the facility filed the notification in 8 above as a generator to any subsequent treatment facilities?	YES	NO	NA
15.1.G.1.a.				

15.1.G.2.b.

c. For treated wastes meeting the applicable treatment standards, or for wastes not subject to any treatment standards, has a certification been signed and accompanies each shipment stating:

YES NO

NA

"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to achieve the performance levels specified in VHWMR Sections 15.4 and 15.3.C. without dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

OR (for wastes with treatment standards expressed as technologies)

"I certify under penalty of law that the waste has been treated in accordance with the requirements of VHWMR Section 15.4.C. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

11. Comments: ALL F002, & F003 WASTE FROM THIS
FACILITY WERE SENT TO AN INCINERATOR.
NO LRW TREATMENT STANDARDS WERE
ATTACHED TO MANIFEST.

Attachment - Land Restricted Wastes

<u>Waste</u>	<u>Effective Date</u>
<u>F001 - F005</u>	11/08/86
F001 - F005 from Small Quantity Generators	11/08/88
F001 - F005 generated via RCRA corrective actions or CERCLA response actions	11/08/88
Hazardous wastes containing less than 1% total F001 - F005 solvent constituents	11/08/88
F001 - F005 soil and debris resulting from RCRA corrective actions or CERCLA response actions	11/08/90
<hr/>	
Dioxin wastes F020 - F023, F026 - F028	11/08/88
F020 - F023, F026 - F028 soil and debris resulting from RCRA corrective actions or CERCLA response actions	11/08/90

California Listed Wastes

Liquid hazardous wastes, including free liquids associated with any solid or sludge, containing free cyanides at concentrations greater than or equal to 1,000 ppm (mg/l). [Effective 7/8/87]

Liquid hazardous wastes, including free liquids associated with any solid or sludge, containing any of the following metals or compounds of these metals at concentrations greater than or equal to those specified below:

Arsenic (as As)	500 mg/l
Cadmium (as Cd)	100 mg/l
Chromium (as Cr VI)	500 mg/l
Lead (as Pb)	500 mg/l
Mercury (as Hg)	20 mg/l
Nickel (as Ni)	134 mg/l
Selenium (as Se)	100 mg/l
Thallium (as Tl)	130 mg/l

Liquid hazardous wastes having a pH less than or equal to 2.0. [Effective 7/8/87]

Liquid hazardous wastes containing PCBs at concentrations greater than or equal to 50 ppm. [Effective 7/8/87]

Liquid hazardous wastes, primarily water, containing greater than or equal to 1000 mg/l HOCs, but less than or equal to 10,000 mg/l HOCs. [Effective 7/8/87]

California waste contaminated soil and debris resulting from RCRA corrective actions or CERCLA response actions. [Effective 11/8/90]

Liquid hazardous wastes, not primarily water, containing greater than or equal to 1000 mg/l HOCs. [Effective 11/8/88]

Nonliquid (non-RCRA/CERCLA) hazardous wastes containing greater than or equal to 1000 mg/l HOCs. [Effective 11/8/88]

<u>First Third Wastes</u>	<u>Effective Date</u>
F006 (nonwastewater)	8/8/88
K001	8/8/88
K004 (nonwastewater)	8/8/88
K008 (nonwastewater)	8/8/88
K015	8/8/88
K016	8/8/88
K018	8/8/88
K019	8/8/88
K020	8/8/88
K021 (nonwastewater)	8/8/88
K022 (nonwastewater)	8/8/88
K024	8/8/88
K025	8/8/88
K030	8/8/88
K036 (nonwastewater)	8/8/88
K037	8/8/88
Nonexplosive K046 (nonwastewater)	8/8/88
K047	8/8/88
K048 - K052	8/8/90
K060 (nonwastewater)	8/8/88
K061 (nonwastewater less than 15% Zn)	8/8/88
K061 (nonwastewater greater than 15% Zn)	8/8/88 - 8/8/90
K062	8/8/88
Non-CaSO4 K069 (nonwastewater)	8/8/88
K071	8/8/90
K083 (nonwastewater)	8/8/88
K086 (solvent washes)	8/8/88
K087	8/8/88
K092	8/8/88
K100	8/8/88
K101	8/8/88
K102	8/8/88
K103	8/8/88
K104	8/8/88
Soil and debris contaminated with first third wastes that have treatment standards based on incineration	8/8/90

"Soft Hammer" First Third Wastes

[Effective Date 5/8/90 or as treatment standards are established]

F007	P001	U007	U151
F008	P004	U009	U154
F009	P005	U010	U155
F019	P010	U012	U157
K004	P011	U016	U158
K008	P012	U018	U159
K011	P015	U019	U171
K013	P016	U022	U177
K014	P018	U029	U180
K017	P020	U031	U185
K021	P030	U036	U188
K022	P036	U037	U192
K031	P037	U041	U200
K035	P039	U043	U209
K036	P041	U044	U210
K046	P048	U046	U211
K060	P050	U050	U219
K061	P058	U051	U220
K069	P059	U053	U221
K073	P063	U061	U223
K083	P068	U063	U226
K084	P069	U064	U227
K085	P070	U066	U228
K086	P071	U067	U237
K101	P081	U074	U238
K102	P082	U077	U248
K106	P084	U078	U249
	P087	U086	
	P089	U089	
	P092	U103	
	P094	U105	
	P097	U108	
	P102	U115	
	P105	U122	
	P108	U124	
	P110	U129	
	P115	U130	
	P120	U133	
	P122	U134	
	P123	U137	